

USDC SDNY  
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ELECTRONICALLY FILED  
DOC #:  
DATE FILED: 6/28/2022

**GOTTLIEB & ASSOCIATES**  
ATTORNEYS

150 E. 18<sup>th</sup> St., Suite PHR • New York, NY 10003  
Tel (212) 228-9795 • Fax (212) 982-6284  
NYJG@aol.com

June 27, 2022

**VIA ECF**

The Honorable Analisa Torres  
United States District Judge  
United States District Court  
Southern District of New York  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, NY 10007

Re: *Picon v. Lou Maddaloni Jewelers, Inc.*,  
Case No.: 1:22-cv-3580

Dear Judge Torres,

The undersigned represents Yelitza Picon, on behalf of herself and all other persons similarly situated ("Plaintiff"), in the above-referenced action against Lou Maddaloni Jewelers, Inc., ("Defendant"). The undersigned respectfully requests that the deadline to submit a joint letter and a jointly proposed Case Management Plan and Scheduling Order by July 5, 2022 (Dkt. 7) be adjourned for 60 days because Counsel for the Defendant has not yet answered or appeared in this Action. Additionally, the undersigned respectfully requests Your Honor grant the Defendant an additional 45 days to respond to the Complaint until August 11, 2022, so that the Defendant has ample opportunity to appear and defend themselves in this Action. This request will grant ample time for the Defendant to retain counsel and for Defendant's Counsel to appear and discuss a possible resolution with Plaintiff's Counsel. This is the Plaintiff's first request for an extension

GRANTED. By **August 11, 2022**, Defendant shall answer or otherwise respond to the complaint. By **September 6, 2022**, the parties shall file their joint letter and proposed case management plan.

SO ORDERED.

Dated: June 28, 2022  
New York, New York

  
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ANALISA TORRES  
United States District Judge